



Environmental Management Hazardous Waste Technical Guide

E201.1001

OVERVIEW

GSA and tenant federal agencies manage government-owned and leased facilities so that any hazardous waste generated, stored, or disposed of poses minimal risk to building occupants and the environment. Most of GSA's inventory is general purpose office, parking, or warehouse space, which do not normally generate hazardous waste. Some commonly used items, such as household cleaners, pesticides, paints, solvents, copier toner, and fluorescent light bulbs with PCB ballast, must be managed as RCRA regulated hazardous waste because of the quantity generated.

Hazardous waste exposure to humans can potentially lead to respiratory illnesses, skin diseases (including cancer), elevated levels of toxic materials in blood and tissues, and death. Hazardous waste can pollute surface and ground waters, kill aquatic life, destroy wildlife, and strip areas of vegetation.

GSA Responsibilities	<ul style="list-style-type: none">■ Implement hazardous waste management program as they apply to GSA owned, leased, and delegated facilities.■ Ensure that hazardous waste management at GSA properties does not pose an environmental liability.
Regional Safety and Environmental Management Personnel Responsibilities	<ul style="list-style-type: none">■ Determine the type and amount of hazardous waste generated at a facility.■ Obtain EPA I.D. number for each facility as required.
Property Management Community Responsibilities	<ul style="list-style-type: none">■ Notify regional environmental staff if client agency is suspected of managing hazardous waste.■ Make sure client agencies manage, manifest, and dispose of hazardous wastes appropriately.■ Make sure PBS facilities manage, manifest, and dispose of hazardous wastes appropriately.■ Prepare Biennial Report as required.
Generator Responsibilities (GSA or Client Agency)	<ul style="list-style-type: none">■ Complete hazardous waste manifest prior to off-site shipment to authorized disposal facility.■ Maintain copies of completed manifests.■ Prepare exception reports if manifests are not received from disposal facility in a timely manner.■ Clean up hazardous waste releases.■ Notify GSA property management about hazardous waste releases.

Hazardous Waste Standards and Regulations

Citation	Topic
40 CFR part 261	Identification and listing of hazardous wastes*
40 CFR part 262	Standards applicable to generators of hazardous wastes*
40 CFR part 263	Standards applicable to transporters of hazardous wastes*
40 CFR part 264-265	Standards applicable to owners and operators of hazardous waste treatment, storage and disposal facilities. Including emergency procedures and writing plans*
40 CFR 266	Standards for materials being recycled*
40 CFR part 279	Used oil management standards*
40 CFR part 280	Underground storage tank standards*

*The entire text of the above regulations is available at:
<http://www.epa.gov/docs/epacr40/chapt-1.info/chi-toc.htm>

Further Information

- **PBS Environmental Hotline**
(800) 379-6505 or pbs hotline@ene.com
- **EPA RCRA Hotline**
(800) 424-9346
- **DOT Hazardous Materials Information Line**
(202) 366-4488
- **GSA Home Page**
<http://www.gsa.gov> - Search term "hazardous waste"
- **PBS Environmental Programs Home Page**
(GSA intranet users only)
<http://insite.gsa.gov/pbs/environmental>
- **EPA RCRA Home Page**
<http://www.epa.gov/epaoswer/osw/hazwaste.htm>
- **Understanding the Hazardous Waste Rules, A Handbook for Small Businesses (Small Quantity Generators)**
http://www.epa.gov/epaoswer/hazwaste/sqg/handbook/sqg_pdf.pdf
- **Hazardous Waste Requirements for Large Quantity Generators**
<http://www.epa.gov/epaoswer/hazwaste/gener/lqgfact.txt>

HAZARDOUS WASTE MANAGEMENT REGULATORY REQUIREMENTS

Identification of Hazardous Waste

A waste generator is responsible for determining if a waste is hazardous and subject to RCRA regulations.

A hazardous waste must first be a solid waste. It can be either a solid, liquid, or gaseous material that is discarded by being disposed of, burned or incinerated, or recycled. Laboratories produce hazardous waste in the form of waste chemicals. Vehicle repair shop hazardous wastes may include spent petroleum products, parts cleaning fluids, and asbestos brake linings. Firing range residues containing lead are also hazardous.

State hazardous waste definitions may be more stringent than those found in 40 CFR 261 and should be reviewed prior to making a hazardous waste determination.

GENERATOR REQUIREMENTS

The amount of hazardous waste generated monthly and accumulated at a facility will determine if the facility is a RCRA large quantity generator (LQG), a small-quantity generator (SQG), or a conditionally exempt small-quantity generator (CESQG).

- LQG requirements:

- Comply with all SQG waste management requirements AND additional LQG training, contingency planning, and record keeping and reporting requirements.

- SQG requirements:

- Obtain an EPA identification number; dispose of hazardous wastes at a RCRA-authorized facility; manage wastes in tanks or containers; label container with the words "hazardous waste," mark the waste accumulation start date on the container; and inspect the containers weekly.

	Generation per month	Accumulation at any time may not exceed
CESQG	<220 lbs.	220 lbs.
SQG	220-2,200 lbs.	13,200 lbs.
LQG	>2,200 lbs.	—

- CESQG requirements:

- Identify all hazardous wastes generated and relinquish them to someone authorized to manage solid wastes. CESQG are **NOT** required to obtain an EPA identification number.
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TRANSPORTER REQUIREMENTS

Generators (GSA or client agencies) that transport hazardous waste off-site must follow the manifesting requirements established by the EPA (40 CFR 263) and Department of Transportation (DOT) packaging requirements (49 CFR 171-180).

- Manifesting - Small and large quantity generators may only send their wastes to a regulated treatment, storage, or disposal facility or recycler. A hazardous waste manifest must accompany all shipments.
 - Packaging requirements - Generators must package, label, and mark all hazardous waste shipments in accordance with DOT regulations.
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REPORTING REQUIREMENTS

Biennial Reports

Facilities must submit biennial reports to the appropriate EPA Regional Administrator by March 1 of each even-numbered year for the previous calendar year. Facilities located in states with EPA-approved programs may also be subject to annual state reporting requirements.

Incident Reports

If an incident (e.g. a release) occurs that requires implementation of the facility contingency plan or emergency procedures, prepare a written report of the incident and submit it to the GSA property manager.
